

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

v.

CADEC GLOBAL, INC. and
NETWORKFLEET, INC.

Defendants.

CIVIL ACTION NO. 6:09-cv-00157

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Patent Rule 4-3 of the Patent Rules of the United States District Court for the Eastern District of Texas and the September 23, 2009 Docket Control Order entered in this case, the parties submit this, their Joint Claim Construction and Prehearing Statement. The parties' Joint Claim Construction Chart is attached as Exhibit "A."

1. The parties estimate that 1.5 hours per side is needed for the claim construction hearing.

2. The parties do not believe that the presentation of evidence will be required at the claim construction hearing. The parties agree that witnesses are not needed at the claim construction hearing unless the Court desires to have live testimony on any issue(s).

3. The parties do not anticipate the need for a prehearing conference.

4. The parties will advise the Court at a later date regarding technical advisors. The deadline for advising the Court regarding technical advisors is March 18, 2010.

(a) So long as a technical advisor is appointed, IGS and NetworkFleet do not believe that a technical tutorial is necessary.

(b) Cadec does not believe that either a technical advisor or a technical tutorial is needed to understand the technology at issue in the patents. Due to severe financial constraints at Cadec, the costs of a technical advisor would impose an undue financial burden on Cadec. However, if the Court should be inclined to have either a technical advisor or a technical tutorial in this case, Cadec would propose that the parties prepare technical tutorials.

(c) IGS believes that the added cost of a technical advisor in this matter would be extremely marginal and very well worth such cost.

5. The parties are, at this time, not aware of any issues that need to be resolved at a prehearing conference.

Dated: March 8, 2010.

Respectfully submitted,

/s/ Paul Morico

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of March, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Wayne B. Maydwell